



**American Mobile**

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February 3, 1999

**VIA HAND DELIVERY**

**RECEIVED**

**FEB 3 1999**

**FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY**

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

Re: *Ex Parte* Presentation  
File Nos. 47-SAT-WAIV-97; 548-SSA-97(50); 1281-DSE-P/L-96  
(Call Sign E960327); ITC-95-341; IB Docket No. 96-111, CC Docket  
No. 93-23, RM-7931; CC Docket No. 87-75; IB Docket No. 95-41; 730-  
DSE-P/L-98; 647-DSE-P/L-98; 1217-SSA-98

Dear Ms. Salas:

On Tuesday, February 2, 1999, Lon Levin, Vice President and Regulatory Counsel for AMSC Subsidiary Corporation ("AMSC"), Robert Goldsmith, Executive Vice President and Chief Operating Officer for AMSC, Richard Evans, Senior Scientist for AMSC, and Bruce Jacobs, counsel for AMSC, met with Linda Haller, Fern Jarmulnek, Harry Ng, and Thomas Tycz of the International Bureau to discuss the adverse impact on AMSC's access to spectrum if the Commission were to grant pending applications to use foreign-licensed satellite systems that operate on frequencies assigned to AMSC. The substance of AMSC's views are a matter of record in these proceedings. A summary of AMSC's position, provided to the International Bureau staff members during this meeting, is attached.

Two copies of this notice for each of the above-captioned proceedings are being submitted to the Secretary of the FCC in accordance with the Commission's Rules. Please direct any questions regarding this matter to the undersigned.

Very truly yours,

Lon C. Levin

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cc: Linda Haller  
Fern Jarmulnek  
Harry Ng  
Thomas Tycz

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## **AMSC NEEDS ITS LICENSED SPECTRUM**

1. If current trends continue, AMSC will need 10 MHz by 2003
2. Demand is being driven by data services
  - a. Multi-mode
  - b. High speed data
    - (i) requires high capacity: each kbps needs approximately 1.3 kHz
3. Wholesale customers demand assurance that AMSC have access to spectrum so that they can profit from their investment
  - a. Current requests include some that want up to 5 MHz
  - b. At least one proposal is for AMS(R)S

## **SPECTRUM COORDINATION PROCESS IS GETTING WORSE**

1. The five North American operators remain aggressive in their demand for at least as much spectrum as coordinated in the 1997 spectrum arrangement
  - a. Inmarsat Standard A use remains steady
  - b. Demand will increase as systems introduce high-speed data terminals
2. Japanese will launch an aeronautical safety system (MTSAT) in 1999 that requires at least 2 MHz in the upper L-band over North America
3. The Australians propose a system (KitCom) that will use a portion of the lower L-band

## **AMSC SEEKS THE RIGHT ENJOYED BY ALL OTHER FCC LICENSEES -- ACCESS TO ITS LICENSED SPECTRUM**

1. No new licenses until AMSC gets sufficient assurance of reasonable access to spectrum for the term of its license
  - a. Any new L-band licensee serving the US at this time undermines this principle
  - b. AMSC continues to be willing to provide any service to any customer at competitive rates
2. If there is additional spectrum in the L-band to serve the US, then there should be a new cut-off for applications to provide that service
3. In the meantime, foreign-licensed MSS companies can compete for authorizations at 2 GHz; TMI and Inmarsat have applications pending to use these bands